

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN DOE,

Plaintiff,

-v.-

JAMES P. EHRHARD ESQ. et al.,

Defendants.

25 Civ. 05724 (JHR)

ORDER

JENNIFER H. REARDEN, District Judge:

Rule 10(a) of the Federal Rules of Civil Procedure requires that “all the parties” be named in the title of a complaint. The Complaint in this case was filed under a pseudonym without leave of this Court.¹ ECF No. 2-1 (Complaint). “Plaintiff[] may not proceed anonymously unless [he] first seek[s] and receive[s] permission to do so.” *Doe v. Combs*, 24 Civ. 7973 (RA) (S.D.N.Y. Oct. 21, 2024) (citing *Sealed Plaintiff v. Sealed Defendant*, 537 F.3d 185, 189 (2d Cir. 2008)); *see also Rapp v. Fowler*, 537 F. Supp. 3d 521, 526-27 (S.D.N.Y. 2021) (concluding in removed case that “[d]istrict courts have discretion to grant an exception to Rule 10(a) only where the litigant seeking to proceed anonymously has a substantial privacy interest that outweighs any prejudice to the opposing party and ‘the customary and constitutionally embedded presumption of openness in judicial proceedings’” (quoting *Sealed Plaintiff*, 537 F.3d at 189)).

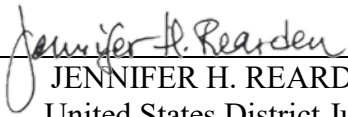
By **August 1, 2025**, Plaintiff shall file a motion seeking leave to proceed under a pseudonym. Failure to comply with this directive will result in Plaintiff being named without further notice.

¹ On June 12, 2025, Plaintiff commenced this action in New York State Supreme Court, Bronx County, by filing the underlying Complaint. ECF No. 2-1.

Moreover, by **July 29, 2025**, to enable the Court to check for any conflicts that would require recusal, Plaintiff shall file **under seal** a declaration disclosing Plaintiff's identity to the Court. To ensure that Plaintiff's name does not appear on the public docket, Plaintiff should entitle the declaration "Declaration of John Doe."

SO ORDERED.

Dated: July 24, 2025
New York, New York



JENNIFER H. REARDEN
United States District Judge